

From: [Wren Stenger](#)
To: [Charles Faultry](#)
Cc: [Carlos Sanchez](#); [Sam Coleman](#); [Donald Williams](#); [Pam Phillips](#); [John Meyer](#); [Mark Peycke](#); [Wren Stenger](#); [Barbara Nann](#); [Gary Miller](#); [Sing Chia](#); [Lydia Johnson](#); [Barbara Aldridge](#)
Subject: Re: Gulfco CC for FY2010
Date: 11/19/2009 12:45 PM

Charles, we really need to map out how we can do this. Here are some outstanding questions that must be answered.

Does the risk assessment support a "no further action ROD?" If not, any work required to address risk would have to be completed before the ROD or included in the AOC for the cap repair and tank removal.

Gary mentioned that the no action ROD would require ICs and monitoring. Does that still qualify as a no action ROD? I am fuzzy on the definition of no action ROD.

Is the cap repair O&M or part of the remedy? It seems to me since this is a superfund site, it is part of the remedy. As I understand it, the cap is part of the site we designated as a superfund site. As a superfund site, the cap would have to be remediated and then Superfund O&M would follow. I don't see how we would claim it as O&M before we implement the remedial action for the cap.

PRPs are still saying they don't want to do the work under an AOC. Gary told me this week the PRPs are willing to do the work. However, I think Gary is talking to the PRP's contractor, and they don't make the decisions for the PRPs. If the PRPs will not sign the AOC, and I understand that we plan to meet with the PRPs shortly and present them with the AOC, we need another approach.

Possible Alternative: Since the site is too old to justify an ISE, if we cannot get a signed AOC by say January, I would suggest we go with a fund lead. We would need to close the loop on "enforcement first" with HQs since we have viable PRPs. We have done a referral, and we might be able to amend it to further justify fund lead. Mark may have some other ideas on how to justify a fund lead. We need to run the traps on this, but fund lead may be the only sure way to get the construction completion in 2010.

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Gulfco CC for FY2010

Charles Faultry to: Carlos Sanchez

11/19/2009
11:01 AM

Cc: Donald Williams, Wren Stenger, "Sam Coleman", Pam Phillips

Sam and Jim (HQ) had a hall way meeting on Gulfco CC. Jim will be supporting us pushing for FY2010 CC. We need to move forward with our plan and meeting goal. Also, make sure that ROD and other activities is on a FY2010 Critical Path Work Plan.
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